

From: Mia, Marcia  
Sent: Thursday, December 20, 2018 02:13 PM  
To: Marsh, Karen  
CC: Hambrick, Amy; Witt, Jon; Witosky, Matthew; Branning, Amy; Mills, Derek  
Subject: RE: OOOOa Reports

I'm here now and can talk. LMK.

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Marsh, Karen  
Sent: Thursday, December 20, 2018 8:56 AM  
To: Mia, Marcia <Mia.Marcia@epa.gov>  
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>  
Subject: RE: OOOOa Reports

Thanks Marcia. I'm not sure that we should be spending the effort pursuing the low production side. Amy B, Derek, and I had a discussion of this yesterday. Should we touch base before the work group call at 10:30?

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mia, Marcia

Sent: Wednesday, December 19, 2018 4:43 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: 0000a Reports

Ok, thanks for following up.

I am trying to get some contract dollars to do the review for us. I can also get a Drilling Info query done to connect the well IDs. I should know more about the contract \$\$ next week.

Marcia B Mia

Air Branch

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From: Marsh, Karen

Sent: Tuesday, December 18, 2018 10:05 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: 0000a Reports

Marcia,

I spoke with Peter at EDF on Friday regarding the low production well data they thought would be available in the compliance reports. He wasn't sure off hand that information is available in the reports to conduct the analysis they suggest in their extension request letter. However, he said if it was there, it may be in the initial compliance

reports. He said they would try to provide specifics in their comment letter so once I track that down, I can send it around.

Thanks!

Karen

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Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Marsh, Karen

Sent: Friday, December 07, 2018 9:27 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>

Subject: 0000a Reports

Marcia,

As I mentioned on the phone yesterday, I took a look at the EDF letter in greater detail and the assertions they were making. I also looked closer at the current CEDRI template (what people have been using if reporting to CEDRI) to see if there is information that could be used to evaluate their claims. Below is my assessment.

EDF implies that the 0000a compliance reports "contain information critical to assessing the feasibility and cost-effectiveness of the NSPS and any purported need to relax the standards."

Average Survey Time:

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

"Site Information" Tab - Number of wells per site (Column C - site name; Column D - count of the well IDs provided)

"Fugitive Emissions Components" Tab - Affected facility (Column B), Date of survey (Column C), survey begin time (Column D), and survey end time (Column D)

Using that information we would calculate a survey duration value. We could then analyze survey times based on the number of wells per site.

Low Production Sites:

EDF further asserts that "EPA's own compliance reports contain information on exponentially greater numbers of low producing sites, and would allow for an assessment of the complexity of the sites and their associated emissions."

# Ex. 5 Deliberative Process (DP)

We can start by taking a look at the Region 8 sites that Cindy highlighted and go from there for the average survey time. I'm not sure how we would proceed on the low production site question. Any thoughts?

Karen

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Karen R. Marsh, PE

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